

**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**ORDER GRANTING TRUSTEE'S MOTION FOR  
ENTRY OF A LITIGATION PROTECTIVE ORDER**

Upon the motion, dated February 1, 2011 (the "Motion"),<sup>1</sup> and amended notice, dated March 14, 2011, of Irving H. Picard (the Trustee"), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC ("BLMIS"), under the Securities Investor Protection Act ("SIPA"), 15 U.S.C. §§ 78aaa, *et seq.*, and the estate of Bernard L. Madoff ("Madoff" and together with BLMIS, the "Debtors"), in the SIPA Liquidation filed in the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court"), pursuant to, *inter alia*, section 105(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101, *et seq.* (the "Bankruptcy Code"), Rule 26 of the Federal Rules of Civil Procedure (the "Federal Rules"), made applicable to these proceedings by Rule 7026 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), for a Litigation Protective

<sup>1</sup> Capitalized terms utilized but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Order governing the use of materials, produced by any party in the lawsuits instituted by the Trustee, which have been or are deemed to comprise or contain Confidential Material, and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b), (e), (f) and (g); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby:

ORDERED that the relief requested in the Motion is hereby granted in its entirety; and it is further

ORDERED that the Litigation Protective Order, attached as Exhibit B to the Motion, is approved and the terms of the Litigation Protective Order shall govern discovery in all adversary proceedings before this Court; and it is further

ORDERED, that the Litigation Protective Order shall supersede the Protective Order, and it is further

ORDERED that this Court retains jurisdiction to enforce and implement the terms and provisions of this Order.

Dated: New York, New York  
March \_\_, 2011

UNITED STATES BANKRUPTCY JUDGE